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PLANNING & COMMUNITY  
DEVELOPMENT

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February 13, 2013

SUBJECT: Arlington – Reconstruction of Massachusetts Avenue  
Pond Street to the Cambridge City Line, Project File No. 604687

Pamela Stephenson, Division Administrator  
Federal Highway Administration, Massachusetts Division  
U.S. Department of Transportation  
55 Broadway - 10th floor  
Cambridge, MA 02142

Attention: John McVann, Director of Project Delivery

Dear Ms. Stephenson:

Thank you for your January 23, 2013 comments including a memorandum from the East Arlington Concerned Citizens Committee and an email from Donna Janis regarding the Massachusetts Avenue Improvement Project in Arlington. Attached please find a response to all comments for your use.

**FHWA Comment:**

*We also raised additional questions in relation to the completeness of the analysis with respect to fully quantifying delay to vehicles merging from two lanes to one lane going westbound on the Massachusetts Avenue and to additional delay introduced to vehicles travelling in a one westbound lane due to turning vehicles at unsignalized intersections (2010 HCM, Page 17-35, Delay due to Turning Vehicles). The above delay does not appear have been included in the output of the 2010 Highway Capacity Manual software.*

**Response:**

A merging analysis is not a component of the analysis procedures requested by FHWA. There is currently no commonly accepted capacity analysis that calculates the delay for a merge into a single lane.

The urban streets capacity analysis was conducted at signalized intersections within the project limits and did not include all of the unsignalized intersections and driveways. This is consistent with the previous analysis completed as part of the 25% design and previously approved Functional Design Report for the corridor. However, a microscopic simulation for the corridor was visually reviewed by Fay, Spofford and Thorndike, Inc. (FST) using the SimTraffic simulation program. This simulation visually showed the merge operating well since the single downstream lane is not over capacity.

FHWA  
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Maurice  
Bernie

**FHWA Comment:**

*As can be seen from the results of the multimodal operation analysis of the Urban Facility, the currently proposed alternative would introduce delays to vehicular and transit traffic as compared to a No-Build alternative. We noted in our prior comments, as communicated in the 2010 Highway Capacity Manual: "Design or operational decisions that are intended to improve the service provided to one mode can sometimes have an adverse impact on the service provided to another mode. The challenge for the analyst is to design and operate the urban system in such a way that all relevant modes are reasonably accommodated." Your response to our Comment # 2, included in your December 6, 2012 letter, briefly notes the fact that the currently proposed design provides a balance between the various modes of travel in the corridor. This statement needs to be expanded and fully supported to document that the current preferred alternative provides a reasonable balance, and adequately and reasonably accommodates all of the travel modes in the corridor. In light of the results of the multimodal analysis of the operation of Massachusetts Avenue, public input should be sought to ensure the preferred alternative reasonably accomplishes the purpose and need of the project.*

**Response:**

At the Design Public Hearing held on April 12, 2011 – FST presented the Town's Project Goals as:

- Maintain Motorist Mobility
- Create a Safer and More Orderly Traffic Flow
- Reduce Through Traffic on Local Neighborhood Streets
- Improve Pedestrian Safety and Mobility
- Enhance the Streetscape
- Improve Cyclist Safety and Mobility
- Improve the Environment for Transit Users

The project as proposed creates improvements for all modes of travel and is consistent with MassDOT and FHWA Bicycle and Pedestrian Accommodation Regulations as well as MassDOT's Complete Streets and GreenDOT Policies.

It is very important to note that a proposed 4-lane section constructed within the existing roadway curb-to-curb dimensions does not meet current state standards and would require State and Federal approval of a Design Exception to be approved for construction.

There are a number of improvements of which the Urban Streets analysis does not take into consideration. The proposed plan provides a reasonable balance by adequately and reasonably accommodating all of the travel modes in the corridor in the following ways:

**Vehicular Traffic**

As discussed in FST's Memorandum dated December 13, 2012, a 4-lane configuration (shared lanes) shows an eastbound delay of 332 seconds as opposed to the 329 seconds that were analyzed as part of the proposed plan. Therefore, there is actually a 3 second decrease for traffic

traveling in the eastbound direction along the entire 1 mile study area. The 4-lane configuration (shared lanes) also shows a weekday evening peak hour cumulative westbound delay of 175 seconds as opposed to the 201 seconds that were analyzed as part of the proposed 3-lane roadway. This represents an increase in the westbound direction of only 26 seconds along the entire 1 mile study area during the weekday evening peak hour. During the other 23 hours per day, when westbound traffic volumes are lower, the difference to westbound vehicle flow will be less.

In summary, a 3 second difference in travel time in the eastbound direction does not represent a significant change. Although an increase of 26 seconds is presented by the analysis for the westbound direction, a portion of this time is expected to be offset by other proposed improvements that will benefit traffic flow/safety and are not reflected by the multi-modal analysis.

#### Pedestrian

A number of improvements are proposed along the corridor. One pedestrian improvement consists of the new signalized pedestrian crossings of Mass Ave at Bates Road. Another significant improvement for pedestrians consists of shortening crosswalks. For the proposed 3-lane configuration, pedestrians will need to cross 37 feet of roadway that is occupied by vehicles (travel lanes). For the 4-lane alternative, pedestrians would need to cross 50 feet of roadway that is occupied by vehicles (travel lanes).

#### Transit

Other significant improvements to traffic operations include the creation of 10 foot wide bus stops. This is an improvement to transit, but also improves traffic by allowing buses to pull completely out of the travel lane and not block traffic in the outer lane as they currently do today and would continue to do so under the No Build and 4-lane alternatives. These improvements have been approved by the MBTA, which is in the process of upgrading bus stops along the entire Mass Ave corridor.

#### Bicycle

The 4-lane alternative provides insufficient space for dedicated bicycle lanes and requires bicycles to share the outside travel lanes with motor vehicles, potentially diminishing safety and level of service for both user groups.

In order to pass a bicycle in the no build or 4-lane alternative, vehicles would need to change lanes or encroach into the leftmost travel lane as they currently do today. Bicycle lanes give bicyclists a dedicated area to ride and make motorists more aware that there may be bicycles present.

The addition of marked bicycle lanes is also an improvement to traffic flow. Under the no build and 4-lane alternatives, bicycles will impede traffic while travelling in substandard width shared lanes.

**FHWA Comment:**

*Based on the result of the multimodal analysis and the correspondence received concerning the opportunity for public input on the referenced project, we have determined an additional "public hearing" for the above referenced project is in the public interest. The hearing will allow full disclosure of this project to the public and give the opportunity for additional public input. This additional opportunity for public input should follow MassDOT's standard public hearing requirements, be transcribed, with public comments accepted. We would expect that MassDOT, the Town of Arlington and its design consultants be present to provide a project overview including description of the project as currently designed, highlighting any changes that have occurred since the 25% design "public hearing," including the results of additional multimodal operation analysis conducted on the project, and those changes accomplished to address the various public comments received. It is also our expectation that we receive the public hearing transcript. Although there appears to have been "other" public meetings and public outreach efforts conducted for the project by the Town, this additional opportunity for public input would be beneficial to clarify any changes that have occurred and allow the Town and their consultants to further explain the project in a more formal meeting.*

**Response:**

The Town has held 30 public meetings to date, including Public Workshops and Informational Meetings, Review Committee Meetings, Business Owner Meetings, Board of Selectmen Meetings and including a MassDOT 25% Design Public Hearing as well as a 75% Design Town Open House meeting.

As requested, an additional MassDOT official Public Hearing is scheduled to be held on February 26, 2013.

**FHWA Comment:**

*The attached January 7, 2012 e-mail from Ms. Donna Janis contains a series of comments made by the East Arlington Concerned Citizens Committee on the multimodal operation analysis completed for the Massachusetts Avenue facility. Our expectation is that MassDOT will address those comments as part of the project development.*

**Response:**

Responses to the comments from the East Arlington Concerned Citizens Committee and Donna Janis are included in the next section of this memorandum. We would also like to note that these comments refer to the DRAFT Memorandum, dated October 12, 2012 and do not appear to reflect any of the additional analyses submitted in response to FHWA's subsequent comments and requests.

**RESPONSE TO COMMENTS PRESENTED IN THE JANUARY 7, 2013  
MEMORANDUM FROM THE EAST ARLINGTON CONCERNED CITIZENS  
COMMITTEE (EACCC).**

**EACCC Comment #1:**

**MISSING SEGMENT**

*FST's analysis extends from Foster Street to Alewife Parkway. While FST acknowledges that the Alewife Parkway intersection is not within the boundaries of this project, they neglect to mention their analysis omits approximately 23% of the Corridor Project's length. Missing are the blocks beginning at the project's west edge at Pond Lane, and then to Palmer Street, Wyman Street, Allen Street, Adams Street to Foster.*

**Response:**

This comment is incorrect. There are no segments missing from the analysis provided in FST's DRAFT Memorandum, dated October 12, 2012. As was explained in the memorandum, the Urban Streets analysis only utilizes nodes at signalized intersections as part of the analysis. Foster Street is the westernmost signalized intersection. Segment results are only reported between each of these nodes.

**EACCC Comment #2:**

**NO BUILD WESTBOUND AT LAKE INTERSECTION IS FLAWED**

*The current westbound lane configuration at Lake Street is simulated as being one through lane headed west toward the Center while the left lane acts as a through lane or a left turn lane for traffic turning onto Lake. However, the common scenario at this 79-80 foot wide intersection during rush hours is that 3 lanes of traffic form, with one waiting to turn left and two serving as through lanes (similar to how five total lanes fit at Medford Street in Arlington Center where the road width is about 78 feet). Consequently, the 2028 No Build westbound through LOS should be C, not F.*

**Response:**

Under the current roadway configuration, there is not sufficient width to properly operate three westbound travel lanes and a parking lane in the westbound direction on Mass Ave at Lake Street. The westbound approach is approximately 39 feet wide, which includes the existing parking lane. Occasionally during the weekday evening peak hour, some drivers may queue in two through lanes. However, in our observations, under the existing conditions, one of the westbound travel lanes generally becomes a single through lane at Lake Street while the other through lane essentially becomes the left turn lane onto Lake Street.

**EACCC Comment #3:**

**BUILD AND NO BUILD EASTBOUND ERROR AT LAKE INTERSECTION**

*A. The 2028 No build and Build configurations at Lake Street are simulated as one right-turn lane and two through lanes, creating optimistic results. However, the bus stop in front of the*

*Capital Theater at the corner of Lake and Mass. Ave. is not intended, nor can it always be used, as a right turn lane. In addition, there is no right on red. This might degrade the 2028 Build rating from C to D headed eastbound.*

**Response:**

A) The criteria used in the multi modal analysis for the location of the bus stop (in front of the Capitol Theatre) and the right turn on red restriction is consistent for both No Build and Build conditions therefore any changes would affect the No Build and Build analysis equally.

Although the analysis printouts provided by the software may not be easy to understand, we have confirmed that the analysis was conducted without assuming turns on red.

*B. With regard to this false 'right turn lane' on Mass. Ave. eastbound at Lake Street, not only is that 'lane' an MBTA bus stop, but it is also frequently blocked while being used as a loading zone or passenger drop off for the Theater. The consequence of this simulation error is barely visible with the data shown as it is for PM peak hours when this eastbound effect is less pronounced due to less volume than in the AM.*

**Response:**

B) The previous signalized intersection analysis submitted and approved during the 25% design phase and included in the Functional Design Report does account for the bus activity within this right turn lane. The Urban Streets Model does not account for the impact of bus stops on the operation since this analysis is built to provide a comparison of the four modes of travel (vehicles, bicycles, pedestrians and transit).

We had been previously informed by the Town that delivery trucks are not permitted to use this area for loading/unloading during the evening peak hour, which is the time period analyzed for this study.

**EACCC Comment #4:**

***SIMULATION AT FOSTER STREET NO BUILD APPEARS FLAWED***

*No turn on red is allowed for either direction when the Foster/Linwood light is red, resulting in optimistic westbound performance.*

**Response:**

The analysis was conducted with no turns allowed on red.

**EACCC Comment #5:**

***LAKE TO THORNDIKE WESTBOUND NO BUILD 2028 SIMULATION FLAWED***

*The simulation of the Lake to Thorndike westbound No build 2028 scenario shows excessive 1.12 stops/vehicle compared to the single lane Build simulation with 0.89 stops/vehicle, resulting in optimistic performance for the Build configuration.*

**Response:**

This comment seems to indicate that the reviewer incorrectly believes that the stops/vehicle is an input value. It is not. This is a resultant output from the software.

**EACCC Comment #6:**

**URBAN STREET SEGMENT REVEALS SERIOUS LOS DEGRADATION**

*The Urban street segment reports show serious service degradation when going from the No build 2028 simulation to the Build simulation. Examples include:*

*A. Between Foster and Lake, with no changes, travel speed is 20.57 mph eastbound and 29.26 westbound. The Build plan adds a traffic light at Bates and more delay. The first 487 foot segment allows travel at 12.42 mph eastbound and 16.75 mph westbound. Bates to Lake segment is 1433 feet and simulated travel at 12.52 mph eastbound and 25.20 mph westbound.*

**Response:**

A) The build condition does include a new signal at Bates Road. This signal is expected to slow traffic along Mass Ave while improving traffic operations for vehicles turning onto or from Bates Road. This condition also provides a signalized pedestrian crossing of Massachusetts Avenue and Bates Road which will enhance pedestrian safety at this location.

*B. The single lane for traffic headed west from Alewife Brook Parkway to Thorndike Street shows serious degradation compared to the No build simulation. The travel speed drops from 17.79 mph to 9.19 mph--nearly half!*

**Response:**

B) The analysis does show that westbound traffic will travel slightly slower during the critical weekday evening peak hour. However, the additional delay is manageable and will amount to an approximately 26 second increase for vehicles travelling the entire one mile project area during the evening peak hour for the proposed 3- lane roadway as compared to the 4- lane alternative. During the other 23 hours per day, when the westbound volumes are lower, there will be no noticeable difference in the westbound capacity.

**EACCC Comment #7:**

**SEGMENT COMPARISONS MISSING**

*Segment comparisons for the entire project length, from Pond Lane to Alewife Brook Parkway are totally missing. What is the average travel speed for each plan?*

**Response:**

This comment is incorrect. There are no segments missing from the analysis. As was explained in the memorandum, the Urban Streets analysis only utilizes nodes at signalized intersections in the analysis. Foster Street is the westernmost signalized intersection. Segment results are only reported between each of these nodes.

**EACCC Comment #8:**

***SIMULATIONS AT FOSTER INTERSECTION PROBLEMATIC***

*A. The frequency that the light is activated for turning with the current design and low turn counts seems too high, at 22 seconds of Green on Mass. Ave. at a time. The Build estimate is 60.5 seconds, thus flowing almost 3X as long.*

**Response:**

A) The analysis was conducted using a maximum green time of 43 seconds on Massachusetts Avenue. The 22 seconds that the reviewer noted is the calculated time before clearing the Mass Ave traffic, which allows the signal to change to Foster Street if vehicles are present on Foster Street. The timing is longer under the build condition due to the proposed coordination with the new signal at Bates Road.

The previous analysis, which was submitted and approved during the 25% design phase of the project, was conducted using Synchro Analysis software, which is typically used for signalized intersection analysis. The Urban Streets Model software, used as requested by FHWA and referenced in recent memoranda for multi-modal analysis, is intended to provide a comparison of the four modes of travel (vehicles, bicycles, pedestrians and transit), and is less appropriate for evaluating proposed signal timing.

*B. Under Movement Group Results, westbound through and left turning columns are not both full on either the No build or Build simulations. Left turn, through and right turn should all have numbers, representing turns on Linwood and Foster, or through.*

**Response:**

B) This comment is incorrect. This is a shared lane; therefore the results are presented for the lane group as a whole. Results are not shown for each turn.

**EACCC Comment #9:**

***NO BUILD. - OBSOLETE TRAFFIC LIGHTS***

*All the No build simulations are based on the obsolete traffic lights which have poor timing, as noted in the Functional Design Report. Timing can be improved, and updated/coordinated signals would be even better. A 4-lane plan would put the 3-lane plan to shame!*

**Response:**

It is true that the timing will be improved. However, not all of the timing upgrades are expected to improve capacity. These timing inputs will also improve the pedestrian crossing times and clearance intervals, which are safety related improvements.

FST conducted a supplemental analysis as requested by FHWA for a 4-lane cross section. As discussed in FST's Memorandum dated December 13, 2012, a 4-lane configuration (shared lanes) shows an eastbound delay of 332 seconds as opposed to the 329 seconds that were



analyzed as part of the proposed plan. Therefore, there is negligible impact (a 3 second decrease for the entire one mile project area) in the eastbound direction. The 4-lane configuration (shared lanes) shows a westbound delay of 175 seconds as opposed to the 201 seconds that were analyzed as part of the proposed 3-lane configuration. This represents an increase in the westbound direction of only 26 seconds along the entire 1 mile study area.

**EACCC Comment #10:**

***FST's FAILURE TO PROVIDE 4-LANE PLAN ANALYSIS UNACCEPTABLE***

*A. The Mass. Avenue Corridor Project at its narrowest point near Thorndike Street is 66' wide. This satisfies the width necessary for shared travel lanes as currently practiced:*

*Two 8' wide parking lanes  
Two 14' wide shared (outer) travel lanes  
Two 11' wide (inner) travel lanes  
TOTAL = 66 feet*

*Most of the corridor is in excess of 66' wide and can accommodate 15' shared lanes and turn lanes easily. By refusing to analyze a 4-lane configuration, the Town of Arlington and FST have failed to satisfy the FHWA request for information and, thus, continue to fail the public.*

**Response:**

A.) It is very important to note that a proposed 4-lane section constructed within the existing roadway curb-to-curb dimensions does not meet current state standards and would require State and Federal approval of a Design Exception to be approved for construction.

A 66-foot wide roadway does not meet MassDOT standards for shared lanes adjacent to parking, which is inferred by the comment. The only portion of the 1-mile project area where the existing roadway width meets or exceeds the required 68-foot width in order to accommodate 15' shared lanes as required is between Orvis Road and Cleveland Street, a distance of 850 feet, which is approximately 15% of the total length of the project. Based on the state's minimum criteria, approximately 85% of the project would need to be widened to 68-feet in order to meet the minimum standards for a 4-lane roadway with shared lanes.

The 4-lane alternative as well as its potential impacts to existing on-street parking, removal of street trees and additional cost was presented at the Board of Selectman's Meeting held on April 28, 2009 at the Hardy School.

Other significant improvements to traffic included in the current plan would no longer be able to be implemented for a 4-lane alternative. These improvements include the creation of 10 foot wide bus stops that will allow buses to pull completely out of the travel lane so they do not block traffic in the outer lane as they currently do today and would continue to do under the 4-lane alternative. The addition of marked bicycle lanes is also an improvement to traffic flow. Under the no build and 4-lane alternatives, bicycles will impede traffic travelling in substandard width shared lanes. In order to pass a bicycle in the no build or 4-lane alternative, vehicles will need to change lanes or encroach into the leftmost travel lane as they do today. Bicycle lanes give

bicyclists a dedicated area to ride and make motorists more aware that there may be bicycles present.

*B. A simulation of a 4-lane configuration with updated traffic lights should be done for the corridor, to include two through lanes and a left turn at Lake Street (accommodated at Lake by Mass. Ave.'s 80' width).*

**Response:**

B.) As was explained to FHWA reviewers at our meeting with them on December 13, 2012, a 4-lane cross section was studied during the preliminary design phase of the project. The additional cost implications and impacts associated with the implementation of a proposed 4-lane section have been previously presented to the Town and analysis included in the 25% Functional Design Report.

The 4-lane alternative as well as its potential impacts to existing on-street parking, removal of street trees and additional cost was presented at the Board of Selectman's Meeting held on April 28, 2009 at the Hardy School.

*C. NO BUILD simulations are inherently inaccurate due to the flexible use of lanes varying with volume, double parking, and truck/bus traffic. At peak times, traffic speeds are lower, working lane width needs decrease, and extra lanes form.*

**Response:**

C.) The No Build alternative does in fact have additional shortfalls that are not accounted for in the analysis. As was previously mentioned, buses and bicycles will continue to impact traffic flow in the No Build and the 4-lane alternative. These impediments to traffic flow are proposed to be removed from the travel lane under the proposed 3-lane section. Similarly, under the proposed 3-lane plan, double parked vehicles and loading areas will also be removed from blocking the vehicular travel lanes as they do today and as they would continue to do under the No Build and 4-lane alternatives.

**EACCC Comment #11:**

*The LOS data are flawed in another way. One example is the Intersection LOS for the Alewife Brook Parkway for vehicles. The LOS is F for both the No Build and Build PM Peak Hour comparisons. However, just as a grade of F in school can represent a numerical grade from 0 to 64/ so too are there gradations within the F LOS grade. This is true because the 2028 Build scenario is based on a corridor with one westbound travel lane removed.*

*Under the 2028 No Build scenario, traffic turning off Alewife Brook Parkway and into Arlington enters Mass. Avenue's existing 2 travel lanes. Under the Build scenario, those two entering lanes of traffic are pinched down (by 44%) into one 14' wide travel lane, starting approximately 125' from Alewife Brook Parkway. Across from the start of that single lane lies Boulevard Road, the first of many side streets (and driveways) on the eastbound side of Mass. Avenue. The driver of any westbound vehicle who wants to turn left onto Boulevard Road must cross the two eastbound travel lanes on the Mass. Avenue corridor. Any delay in that driver's left turn will cause all*

vehicles behind him to stop. They will no longer have room to go around without encroaching on the bike lane--an illegal and dangerous maneuver. From this point, it will only take 10 to 15 backed up vehicles to reach into the Alewife Brook intersection--a scenario that will happen with some frequency, especially in inclement weather at night during the late fall and winter months. The two eastbound lanes entering this intersection are often backed up during Peak drive times. The westbound driver desiring to turn left will often need to wait.

**Response:**

The Mass Avenue westbound travel lane is approximately 20 feet wide in the vicinity of Boulevard Road. This is sufficient width to pass a left turning vehicle without encroaching on the shoulder. There is no westbound bike lane proposed at this location as we intend to keep the current pavement width to accommodate turning and merging traffic movements.

*A second example occurs at the intersection of Lake Street with Mass. Avenue. The Intersection LOS for the Northbound vehicles at that intersection is F for both the No Build and Build 2028 PM Peak Hour scenarios. However, the F LOS for the No Build scenario is less degraded than the F LOS for the Build scenario. This is true because the 2028 Build scenario is based on one 11' wide westbound travel lane at that intersection rather than the existing 25' (two travel lanes) of westbound roadway in the No Build scenario.*

**Response:**

The westbound approach does not have 25 feet available for through traffic at Lake Street as the reviewer indicated. As discussed in Comment #2, the westbound approach is approximately 39 feet wide, which includes the existing parking lane. After accounting for the parking lane and left turn lane, 20-21 total feet is available to accommodate through traffic. It should also be considered that drivers tend to shy a couple feet away from parked vehicles. During some periods during the weekday evening peak hour, drivers may queue in two through lanes. However, due to the limited width and proximity to adjacent parking, this practice should not be encouraged.

*In the Build scenario, drivers traveling north on Lake Street and taking a left to go westbound on Mass. Avenue will be turning into a roadway that has been narrowed by 56% from the roadway that exists in the No Build scenario. In extremely close proximity to this intersection lies the northbound one-way Winter Street with its east/west crosswalk. Some drivers entering Mass Ave from Lake Street will travel west for a distance of less than 40 feet and then seek to make a right onto Winter Street. Some of these drivers will need to wait at times because of pedestrians using the Winter Street unsignalized crosswalk.*

*In the No Build scenario, Lake Street's traffic exiting left simply gets into Mass. Ave.'s left lane and continues west, while left turning cars seeking a quick right onto Winter Street get in Mass. Ave.'s right lane. In the Build scenario, Lake Street's traffic exiting left gets into a single lane, and any car seeking a quick right turn onto Winter Street who must wait for pedestrians to clear the Winter Street crosswalk will effectively stop all vehicles behind it. This increases the risk of rear-ending, and also the likelihood of gridlock in the intersection as traffic, backed up behind the stopped car, will not have time to clear the intersection before Mass. Avenue east/west traffic gets a Green light.*

**Response:**

The Winter Street crosswalk will be located in approximately the same location for the 4-lane and 3-lane configurations. Therefore a driver stopping for a pedestrian will not block traffic anymore for the 3-lane configuration than the 4-lane configuration. There is sufficient room for a vehicle turning onto Mass Ave to pass a vehicle turning right onto Winter Street under both configurations.

**EACCC Comment #12:**

***FST MEMO OF 10-22-12-SUGGESTS KEEPING ANALYSIS UNDER WRAPS?***

*In FST's Memorandum dated October 22, 2012 to Kimberley Sloan (MassDOT) John Michalak (FST) writes:*

*"At this stage of this project, we believe it would be counterproductive and potentially confusing to the general public to begin presenting a vehicular level of service that is based on different criteria than the intersection analysis that has been discussed for the past two years. Due to the issues highlighted in this memorandum, FST recommends that FHWA reconsider its request to use this new analysis on this project... ". This veiled suggestion that FST's LOS analysis, flawed as it is, be kept from public view would be stunning in its audacity, were it not so completely in keeping with the town's history of developing its corridor design under the radar and then, when the veil of secrecy was lifted (no thanks to the Town), employing misinformation and scare tactics to befuddle the public. Our FOIA did not uncover any evidence that Kimberley Sloan of MassDOT rejected Mr. Michalak's suggestion.*

*It is understandable that FST, MassDOT and the Town of Arlington would prefer to keep these poor results quiet as, even with the many procedural flaws outlined above, the best FST's analysis presents is a \$5.8 million plan that makes pedestrians less safe, worsens traffic flow and offers only slight improvement for bicyclists in East Arlington--a part of town already bordered by three bicycle accommodations (Minute Man Bikeway, Alewife Bike Path, and Mystic Avenue bike lanes.) The Town of Arlington predicated this project on making Mass. Avenue safer for pedestrians, continually referencing two pedestrian fatalities of seventeen years ago as the impetus for this plan. FST's analysis shows the present Corridor Project design falls well short of the town's stated goals.*

**Response:**

The quote that is attributed to FST is taken out of context and is misleading. Since the Urban Street analysis package is very new and hasn't been fully reviewed by the traffic/transportation industry, FST cautioned MassDOT and FHWA that the analysis and the results could give inaccurate and/or unreliable results, and may be confusing to reviewers as well as the public. This is especially true since this analysis and methodology is new and as far as we can determine, has not been used in this state by other traffic engineers or state agencies. In fact, to the best of our knowledge, this is the only project that has been required by FHWA to use this multi-modal analysis and software program.

MassDOT has not adopted this program for roadway design, and concurred with our concerns regarding use of the new software in their Memorandum dated November 14, 2012. The

analysis that was previously presented in the Functional Design Report was based on an analysis package (Synchro) that is commonly used and has been fully reviewed and accepted by MassDOT.

Once again, it should be noted that the vehicle capacity portion of the Urban Street analysis results are only one piece of the design of the corridor. The capacity analysis focuses on the delay to drivers and is not reflective of safety improvements for all users. These safety improvements will be a benefit to drivers, pedestrians and bicyclists.

#### Responses to Donna Janis email of January 7, 2013

##### Comment #1:

*MassDOT, the Town of Arlington and Fay, Spofford & Thorndike (FST) officials misrepresented to FHWA that the Town's April 4, 2012 Open House was a formal public meeting about the Mass. Ave. Corridor Project.*

##### Response:

On April 4, 2012, from 6:00 pm to 8:00 pm, the Town held a public open house meeting on the Mass. Ave. Corridor Project. The open house was held about 5 weeks after the submission of the 75% design plans to MassDOT on February 28, 2012. There was no requirement that a public meeting or hearing occur at this stage of the project. The Town held the meeting voluntarily in order to show the residents the changes to the project between 25% design and 75% design. These included the extension of the 2 inbound lanes west to Pond Lane, the full length of the project area, and additional detail in the landscape plans that had been further developed since 25% design. The Town particularly wanted to show abutters locations and species of trees and shrubs, location of planters, benches, lighting and other street furniture, to provide an opportunity for comment before the final 100% plans were submitted.

Outreach for the public open house consisted of announcements appearing in the Town of Arlington Notices (attached), which goes to over 4000 Arlington residents, and also goes to the Arlington List, with 4-5000 subscribers, with some overlap between the two. Three notices went out to those 2 sources, on March 19, March 20 announcing a new location, and finally again on April 3. The local press also receives these notices (Arlington Advocate, Arlington Patch, and Your Arlington).

Three Town staffers were present to show and explain the new plans. Staffers were Michael Rademacher, Director of Public Works; Carol Kowalski, Director of Planning; and Laura Wiener, Senior Planner. The open house was well attended by the public. The Arlington Advocate estimated that 80 people attended. Your Arlington, an online, independent, local news source estimated 50 people attended. There were no sign in sheets, but written comments were solicited on index cards. Seventy individuals made written comments on comment cards—not 70 comments, but 70 individual commenters. The comments were both negative and positive, and were from many people who have been engaged in this process for some time, including members of East Arlington Concerned Citizens Committee who attended. Comment cards included comments from Eric Berger, Mark Kaepplein, Donna Janis, and Sheri Baron. Maria Romano also attended.

The Town called this an open house specifically to allow the public to engage directly with staff and to study the plans and ask questions. Multiple copies of the actual full-size plans were displayed around the room to maximize opportunities to view the details and specifications of the 75% design. The Town or MassDOT never represented this as a public hearing, which has different requirements for notice and recording of comments than a public meeting. We received comments from Federal Highway in August, 2012 that asked the Town to "hold an additional formal public meeting to inform the public of the direction of the project and seek further public input". We realized then that FHWA did not know about the Town's public open house which was held to do just that, inform the public of the direction of the project and seek further public input. Given the repeated claims of a lack of public engagement, we did not want FHWA to be unaware of this public gathering attended by 50-80 members of the public.

Comment #2:

*Arlington officials, MassDOT and FST officials colluded to eliminate or curtail public participation in the development of the Mass. Ave. Corridor Project.*

Response:

The correspondents' assertion that the Town of Arlington, MassDOT and Fay Spofford & Thorndike collaborated to limit public engagement is contradicted by the facts. Thirty (30) meetings open to the public starting in October, 2008 (including the 2011 MassDOT public hearing) were held. Project opponents claim they were excluded from participating prior to 2008. In fact, the Town received Notice to Proceed on design and engineering of this project from MassDOT on August 20, 2008. No design work, design concepts, or engineering work was done prior to that date, and therefore no public outreach on design occurred prior to 2008. There have been numerous opportunities to comment on this project. Many people have done so. The plan has changed many times in direct response to public input. The original plan had 2 lanes, and now has 3. Trees and street furniture were moved, species changed, bus stops moved, and brickwork replaced with stamped concrete, all in response to comments from the public.

Comment #3:

*FST's Multi-Modal Analysis, produced in response to Tomasz Janikaila's memorandum of August 20, 2012, is replete with flaws and misrepresentation. Attached is our preliminary outline of those mistakes.*

Response:

Please see all above information regarding the multi-modal analysis.

Comment #4:

*Our FOIA documents reveal that the Town of Arlington seeks to "advertise" the Mass. Ave. Corridor Project starting March 16, 2013. We believe that represents the Town's first step in the bid process.*

*Residents and local businesses have gathered more than 3,600 signatures on a petition submitted today to the Town's Registrars for certification of signatures. The petition requests to have the following non-binding question placed on the April 6, 2013 ballot:*

*"Shall the Town keep four vehicular travel lanes on Massachusetts Avenue in East Arlington as now practiced? Yes \_\_\_ No \_\_\_"*

*The threshold to place a question on the ballot is 10% of the Town's registered voters, and the submitted signatures are well in excess of that.*

*Any attempt by the Town to put this project out to bid mere weeks before voters are allowed finally to speak on this issue would be reprehensible, yet consistent with past Town actions to prevent public participation as our mailing will amply demonstrate.*

***WE ASK FHWA TO DIRECT ARLINGTON OFFICIALS NOT TO ADVERTISE THIS PROJECT UNTIL YOU HAVE READ OUR MAILED DOCUMENT, AND UNTIL THE APRIL VOTING RESULT IS KNOWN AND FHWA HAS HAD SUFFICIENT OPPORTUNITY TO ADDRESS THE VOTE RESULTS.***

*For further information, please contact EACCC representative Eric Berger at:*

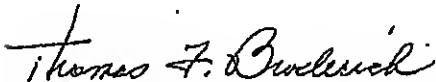
*781-859-5096 (preferred) or 339-368-1713 (cell)*

**Response:**

The current scheduled advertising date is June 1, 2013.

Thank you for your comments on this important project. Should you have any questions regarding this information, please feel free to contact Kimberley Sloan, MassDOT Project Manager, at (857) 368-9328 or Laura Wiener, Town of Arlington, Senior Planner, at (781) 316-3091.

Sincerely,



Thomas F. Broderick, P.E.  
Chief Engineer.

Att: April 4, 2012 Town of Arlington open house meeting information

KS/ks

cc: Frank DePaola, Administrator  
Patricia Leavenworth, P.E., District Highway Director  
Adam Chapdelaine, Arlington Town Administrator